

**Executive Summary – Enforcement Matter – Case No. 56359**  
**City of Moulton**  
**RN101391787**  
**Docket No. 2018-0921-PWS-E**

**Order Type:**

Findings Agreed Order

**Findings Order Justification:**

Three or more enforcement actions (NOVs, orders, etc.) over the prior five year period for the same violation(s).

**Media:**

PWS

**Small Business:**

No

**Location(s) Where Violation(s) Occurred:**

City of Moulton PWS, 104 South Hackberry Street, Moulton, Lavaca County

**Type of Operation:**

Public water supply

**Other Significant Matters:**

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

**Texas Register Publication Date:** September 28, 2018

**Comments Received:** No

***Penalty Information***

**Total Penalty Assessed:** \$584

**Total Paid to General Revenue:** \$584

**Total Due to General Revenue:** \$0

Payment Plan: N/A

**Compliance History Classifications:**

Person/CN - Satisfactory

Site/RN - N/A

**Major Source:** No

**Statutory Limit Adjustment:** N/A

**Applicable Penalty Policy:** April 2014

***Investigation Information***

**Complaint Date(s):** N/A

**Complaint Information:** N/A

**Date(s) of Investigation:** June 4, 2018 through June 29, 2018

**Date(s) of NOE(s):** June 29, 2018

**Executive Summary – Enforcement Matter – Case No. 56359**  
**City of Moulton**  
**RN101391787**  
**Docket No. 2018-0921-PWS-E**

***Violation Information***

1. Failed to comply with the maximum contaminant level ("MCL") of 0.080 milligrams per liter for total trihalomethanes ("TTHM") based on the locational running annual average, and failed to provide public notification and submit a copy of the public notification, accompanied with a signed Certificate of Delivery, to the Executive Director regarding the failure to comply with the MCL for TTHM [30 TEX. ADMIN. CODE §§ 290.115(f)(1) and 290.122(b)(2)(A) and (f) and TEX. HEALTH & SAFETY CODE § 341.0315(c)].
2. Failed to conduct an operation evaluation and submit a written operation evaluation report to the Executive Director within 90 days after being notified of analytical results that caused an exceedance of the operational evaluation level for TTHM for Stage 2 Disinfection Byproducts [30 TEX. ADMIN. CODE § 290.115(e)(2)].

***Corrective Actions/Technical Requirements***

**Corrective Action(s) Completed:**

The Respondent provided public notification regarding the failure to comply with the MCL for TTHM during the first quarter of 2018 by July 8, 2018.

**Technical Requirements:**

The Order will require the Respondent to:

- a. Within 30 days, conduct an operation evaluation and submit an operation evaluation report to the Executive Director;
- b. Within 45 days, submit written certification demonstrating compliance with a.;
- c. Within 365 days, return to compliance with the locational running annual average MCL for TTHM; and
- d. Within 380 days, submit written certification to demonstrate compliance with c.

**Executive Summary – Enforcement Matter – Case No. 56359**  
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***Contact Information***

**TCEQ Attorney:** N/A

**TCEQ Enforcement Coordinator:** Ross Luedtke, Enforcement Division, Enforcement Team 8, MC R-09, (254) 761-3036; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

**Respondent:** LuAnn D. Rogers, City Administrator, City of Moulton, P.O. Box 369, Moulton, Texas 77975

The Honorable Mark Zimmerman, Mayor, City of Moulton, P.O. Box 369, Moulton, Texas 77975

**Respondent's Attorney:** N/A





## Penalty Calculation Worksheet (PCW)

<b>DATES</b>	<b>Assigned</b>	2-Jul-2018	<b>Screening</b>	6-Jul-2018	<b>EPA Due</b>	30-Sep-2018
PCW		18-Jul-2018				

**RESPONDENT/FACILITY INFORMATION**

<b>Respondent</b>	City of Moulton
Reg. Ent. Ref. No.	RN101391787
<b>Facility/Site Region</b>	14-Corpus Christi

Major/Minor Source Minor

**CASE INFORMATION**

<b>Enf./Case ID No.</b>	56359	<b>No. of Violations</b>	2
<b>Docket No.</b>	2018-0921-PWS-E	<b>Order Type</b>	Findings
<b>Media Program(s)</b>	Public Water Supply	<b>Government/Non-Profit</b>	Yes
Multi-Media		<b>Enf. Coordinator</b>	Ross Luedtke
		<b>EC's Team</b>	Enforcement Team 8

Admin. Penalty \$ Limit Minimum \$50 Maximum \$1,000

## Penalty Calculation Section

**TOTAL BASE PENALTY (Sum of violation base penalties)****Subtotal 1** \$350**ADJUSTMENTS (+/-) TO SUBTOTAL 1**

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

**Compliance History** 67.0% Adjustment **Subtotals 2, 3, & 7** \$234

Notes Enhancement for four NOVs with the same/similar violations, one NOV with dissimilar violations, one agreed order containing a denial of liability, and one agreed order without a denial of liability.

**Culpability** No 0.0% Enhancement **Subtotal 4** \$0

Notes The Respondent does not meet the culpability criteria.

**Good Faith Effort to Comply Total Adjustments** **Subtotal 5** \$0**Economic Benefit** 0.0% Enhancement\* **Subtotal 6** \$0  
\*Capped at the Total EB \$ Amount  
Total EB Amounts \$620  
Estimated Cost of Compliance \$5,125**SUM OF SUBTOTALS 1-7** **Final Subtotal** \$584**OTHER FACTORS AS JUSTICE MAY REQUIRE** 0.0% **Adjustment** \$0

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

**Final Penalty Amount** \$584

**STATUTORY LIMIT ADJUSTMENT** **Final Assessed Penalty** \$584**DEFERRAL** 0.0% Reduction **Adjustment** \$0

Reduces the Final Assessed Penalty by the indicated percentage.

Notes No deferral is recommended for Findings Orders.

**PAYABLE PENALTY** \$584

Screening Date 6-Jul-2018

Docket No. 2018-0921-PWS-E

PCW

Respondent City of Moulton

Policy Revision 4 (April 2014)

Case ID No. 56359

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN101391787

Media [Statute] Public Water Supply

Enf. Coordinator Ross Luedtke

### Compliance History Worksheet

#### >> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	4	20%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1	25%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2)

67%

#### >> Repeat Violator (Subtotal 3)

N/A

Adjustment Percentage (Subtotal 3)

0%

#### >> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7)

0%

#### >> Compliance History Summary

Compliance History Notes

Enhancement for four NOVs with the same/similar violations, one NOV with dissimilar violations, one agreed order containing a denial of liability, and one agreed order without a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, &amp; 7)

67%

#### >> Final Compliance History Adjustment

Final Adjustment Percentage \*capped at 100%

67%

Screening Date 6-Jul-2018

Docket No. 2018-0921-PWS-E

PCW

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Respondent City of Moulton

Case ID No. 56359

Reg. Ent. Reference No. RN101391787

Media [Statute] Public Water Supply

Enf. Coordinator Ross Luedtke

Violation Number

1

Rule Cite(s)

30 Tex. Admin. Code §§ 290.115(f)(1) and 290.122(b)(2)(A) and (f) and Tex. Health &amp; Safety Code § 341.0315(c)

Violation Description

Failed to comply with the maximum contaminant level ("MCL") of 0.080 milligrams per liter ("mg/L") for total trihalomethanes ("TTHM") based on the locational running annual average. Specifically, the locational running annual average concentrations of TTHM for Stage 2 Disinfection Byproducts ("DBP2") at Site 1 for the first quarter of 2018 and the second quarter of 2018 were 0.084 mg/L and 0.083 mg/L, respectively, and DBP2 at Site 2 for the first quarter of 2018 and the second quarter of 2018 were 0.081 mg/L and 0.081 mg/L, respectively. Additionally, failed to provide public notification and submit a copy of the public notification, accompanied with a signed Certificate of Delivery, to the Executive Director regarding the failure to comply with the MCL of 0.080 mg/L for TTHM during the first quarter of 2018. Specifically, public notification was required by May 13, 2018, but was not provided.

Base Penalty

\$1,000

## &gt;&gt; Environmental, Property and Human Health Matrix

OR

Release	Harm			Percent
	Major	Moderate	Minor	
Actual	x			15.0%
Potential				

## &gt;&gt; Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
				0.0%

Matrix Notes

Exceeding the MCL for TTHM and failure to provide public notification caused persons served by the Facility to be exposed to a significant amount of contaminants which do not exceed levels protective of human health.

Adjustment

\$850

\$150

## Violation Events

Number of Violation Events

2

180

Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	x
single event	

Violation Base Penalty

\$300

Two annual events are recommended, one for each Site.

## Good Faith Efforts to Comply

0.0%

Reduction

\$0

Before NOE/NOV NOE/NOV to EDPRP/ Settlement Offer

Extraordinary	
Ordinary	
N/A	x

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal

\$300

## Economic Benefit (EB) for this violation

## Statutory Limit Test

Estimated EB Amount

\$615

Violation Final Penalty Total

\$501

This violation Final Assessed Penalty (adjusted for limits)

\$501

## Economic Benefit Worksheet

**Respondent** City of Moulton

**Case ID No.** 56359

**Reg. Ent. Reference No.** RN101391787

**Media** Public Water Supply

**Violation No.** 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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**Item Description**

**Delayed Costs**

Equipment			0.00	\$0	\$0	\$0	
Buildings			0.00	\$0	\$0	\$0	
Other (as needed)	\$5,000	31-Mar-2018	2-Jan-2020	1.76	\$29	\$586	\$615
Engineering/Construction			0.00	\$0	\$0	\$0	
Land			0.00	\$0	n/a	\$0	
Record Keeping System			0.00	\$0	n/a	\$0	
Training/Sampling			0.00	\$0	n/a	\$0	
Remediation/Disposal			0.00	\$0	n/a	\$0	
Permit Costs			0.00	\$0	n/a	\$0	
Other (as needed)	\$25	13-May-2018	8-Jul-2018	0.15	\$0	n/a	\$0

The first other delayed cost includes the estimated amount for the Facility to implement an alternative method of disinfection, calculated from the last day of the first quarter of noncompliance to the estimated date of compliance.

**Notes for DELAYED costs**

The second other delayed cost includes the estimated amount to ensure that the delinquent public notification (\$25 per notification x one notification) is provided to persons served by the Facility and a copy of the notification, accompanied with a signed Certificate of Delivery, is submitted to the Executive Director, calculated from the due date of the public notification to the date of compliance.

**Avoided Costs**

**ANNUALIZE avoided costs before entering item (except for one-time avoided costs)**

Disposal			0.00	\$0	\$0	\$0
Personnel			0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling			0.00	\$0	\$0	\$0
Supplies/Equipment			0.00	\$0	\$0	\$0
Financial Assurance			0.00	\$0	\$0	\$0
ONE-TIME avoided costs			0.00	\$0	\$0	\$0
Other (as needed)			0.00	\$0	\$0	\$0

**Notes for AVOIDED costs**

Approx. Cost of Compliance

**TOTAL**

**Screening Date** 6-Jul-2018  
**Respondent** City of Moulton  
**Case ID No.** 56359

**Docket No.** 2018-0921-PWS-E

**PCW**

Policy Revision 4 (April 2014)  
PCW Revision March 26, 2014

**Reg. Ent. Reference No.** RN101391787

**Media [Statute]** Public Water Supply  
**Enf. Coordinator** Ross Luedtke  
**Violation Number** 2  
**Rule Cite(s)**

30 Tex. Admin. Code § 290.115(e)(2)

**Violation Description**

Failed to conduct an operation evaluation and submit a written operation evaluation report to the Executive Director within 90 days after being notified of analytical results that caused an exceedance of the operational evaluation level for TTHM for DBP2 at Sites 1 and 2 during the fourth quarter of 2017.

**Base Penalty** \$1,000

#### >> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
		Actual			
	Potential				0.0%

#### >> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
	x			5.0%

Matrix Notes

100% of the rule requirements were not met.

**Adjustment** \$950

\$50

#### Violation Events

Number of Violation Events 1 Number of violation days 109

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

**Violation Base Penalty** \$50

One single event is recommended.

#### Good Faith Efforts to Comply

Extraordinary	0.0%		Reduction
	Before NOE/NOV	NOE/NOV to EDPRP/ Settlement Offer	
Ordinary			
N/A	x		

Notes The Respondent does not meet the good faith criteria for this violation.

**Violation Subtotal** \$50

#### Economic Benefit (EB) for this violation

**Estimated EB Amount** \$5

#### Statutory Limit Test

**Violation Final Penalty Total** \$84

**This violation Final Assessed Penalty (adjusted for limits)** \$84

## Economic Benefit Worksheet

**Respondent** City of Moulton

**Case ID No.** 56359

**Reg. Ent. Reference No.** RN101391787

**Media** Public Water Supply

**Violation No.** 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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**Delayed Costs**

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$100	19-Mar-2018	16-Feb-2019	0.92	\$5	n/a	\$5
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

**Notes for DELAYED costs**

The delayed cost includes the estimated amount to conduct an operation evaluation and submit an operation evaluation report to the Executive Director, calculated from the due date of the operation evaluation report to the estimated date of compliance.

**Avoided Costs**

**ANNUALIZE avoided costs before entering item (except for one-time avoided costs)**

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

**Notes for AVOIDED costs**

Approx. Cost of Compliance

**TOTAL**



# Compliance History Report

Compliance History Report for CN600631766, RN101391787, Rating Year 2017 which includes Compliance History (CH) components from September 1, 2012, through August 31, 2017.

**Customer, Respondent, or Owner/Operator:** CN600631766, City of Moulton

**Classification:** SATISFACTORY

**Rating:** 2.25

**Regulated Entity:**

RN101391787, CITY OF MOULTON

**Classification:** NOT APPLICABLE

**Rating:** N/A

**Complexity Points:**

N/A

**Repeat Violator:** N/A

**CH Group:**

14 - Other

**Location:**

104 SOUTH HACKBERRY STREET IN MOULTON, LAVACA COUNTY, TEXAS

**TCEQ Region:**

REGION 14 - CORPUS CHRISTI

**ID Number(s):**

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 1430002

**Compliance History Period:** September 01, 2012 to August 31, 2017      **Rating Year:** 2017      **Rating Date:** 09/01/2017

**Date Compliance History Report Prepared:** July 06, 2018

**Agency Decision Requiring Compliance History:** Enforcement

**Component Period Selected:** July 06, 2013 to July 06, 2018

## TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

**Name:** Ross Luedtke

**Phone:** (512) 239-3157

## Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period?      YES  
2) Has there been a (known) change in ownership/operator of the site during the compliance period?      NO

## Components (Multimedia) for the Site Are Listed in Sections A - J

### **A. Final Orders, court judgments, and consent decrees:**

1      Effective Date: 07/10/2015      ADMINORDER 2015-0078-PWS-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM LRAA MCL 3Q2014 - Failed to comply with the MCL of 0.080 milligrams per liter ("mg/L") for TTHM, based on the locational running annual average. Specifically, the locational running annual average concentrations for TTHM at Stage 2 Disinfection Byproducts site 1 were 0.089 milligrams per liter ("mg/L") for the third quarter of 2014 and 0.084 mg/L for the fourth quarter of 2014.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(2)(A)  
30 TAC Chapter 290, SubChapter F 290.122(f)

Description: TTHM DBP2 MCL PN 3Q2014 Posting and Reporting Violation - Failed to timely provide public notification and submit a copy of the public notification to the Executive Director regarding the failure to comply with the MCL for TTHM for the third quarter of 2014.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM LRAA MCL 4Q2014 - Failed to comply with the MCL of 0.080 milligrams per liter ("mg/L") for TTHM, based on the locational running annual average. Specifically, the locational running annual average concentrations for TTHM at Stage 2 Disinfection Byproducts site 1 were 0.089 milligrams per liter ("mg/L") for the third quarter of 2014 and 0.084 mg/L for the fourth quarter of 2014.

2      Effective Date: 02/07/2017      ADMINORDER 2016-1241-PWS-E (Findings Order-Agreed Order Without Denial)  
Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM LRAA MCL 2Q2016 - Respondent failed to comply with the MCL of 0.080 mg/L for TTHM, based on the locational running annual average; the locational running annual average concentrations of total trihalomethanes ("TTHM") for Stage 2 Disinfection Byproducts ("DBP2") at Site 1 were 0.083 milligrams per liter ("mg/L") for the second quarter of 2016, and at Site 2 were 0.082 mg/L for the first quarter of 2016 and 0.089 mg/L for the second quarter of 2016.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
5A THSC Chapter 341, SubChapter A 341.0315(c)

Description: TTHM LRAA MCL 1Q2016 - Failed to comply with the MCL of 0.080 mg/L for TTHM, based on the locational running annual average; the locational running annual average concentrations of total trihalomethanes ("TTHM") for Stage 2 Disinfection Byproducts ("DBP2") at Site 1 were 0.083 milligrams per liter ("mg/L") for the second quarter of 2016, and at Site 2 were 0.082 mg/L for the first quarter of 2016 and 0.089 mg/L for the second quarter of 2016.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.117(c)(2)(C)  
30 TAC Chapter 290, SubChapter F 290.117(h)  
30 TAC Chapter 290, SubChapter F 290.117(i)(1)

Description: LCR RD MR 3Y2015 - Respondent did not collect lead and copper tap samples at the required ten sample sites, have the samples analyzed, and report the results to the Executive Director for the January 1, 2013 through December 31, 2015 monitoring period.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter H 290.272  
30 TAC Chapter 290, SubChapter H 290.273  
30 TAC Chapter 290, SubChapter H 290.274(a)  
30 TAC Chapter 290, SubChapter H 290.274(c)

Description: CCR 2014- Failed to meet the adequacy requirements of the CCR distributed to the customers of the Facility for 2014; in the Consumer Confidence Report ("CCR") distributed to the customers of the Facility for 2014, the source water assessment language was incorrect, the name of the source of water was missing, the disinfectant residual information was missing, delivery to customers was incorrect, and certification of delivery was missing or incomplete.

Classification: Moderate

Citation: 30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)  
30 TAC Chapter 290, SubChapter F 290.122(f)

Description: DLQOR MR PN 3Q2015 Posting and Reporting Violation - Respondent did not timely provide public notification and submit a copy of each public notification to the Executive Director regarding the failure to submit a Disinfectant Level Quarterly Operating Report ("DLQOR") for the third quarter of 2015.

**B. Criminal convictions:**

N/A

**C. Chronic excessive emissions events:**

N/A

**D. The approval dates of investigations (CCEDS Inv. Track. No.):**

N/A

**E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):**

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1 Date: 11/01/2017 (1450030)  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter D 290.46(d)(2)(A)  
30 TAC Chapter 290, SubChapter F 290.110(b)(4)  
Description: Failed to maintain a disinfectant residual concentration in the water within the distribution system of at least 0.2 mg/L free chlorine.

2 Date: 04/06/2018 (1498002)  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(e)(2)  
30 TAC Chapter 290, SubChapter F 290.115(f)(5)  
Description: DBP2 TTHM OEL Reporting - This system failed to submit the Operational Evaluation Report (OEL) after exceeding the operational evaluation level for trihalomethanes at 519 South Lavaca Dr, Moulton (DBP2-01) and 306 Longhorn Drive, Moulton (DBP2-02) within the required timeline.

3 Date: 04/13/2018 (1498002)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: TTHM LRAA MCL 1Q2018 - During the first quarter of 2018 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.084 mg/L at 519 South Lavaca Dr, Moulton (DBP2-01) and with a LRAA of 0.081 mg/L at 306 Longhorn Drive, Moulton (DBP2-02).

4 Date: 05/29/2018 (1498002)  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(2)(A)  
30 TAC Chapter 290, SubChapter F 290.122(f)  
Description: TTHM DBP2 MCL PN 1Q2018 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation of the maximum contaminant level for trihalomethanes during the first quarter of 2018.

5 Date: 06/13/2018 (1498002)  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: TTHM LRAA MCL 2Q2018 - During the second quarter of 2018 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.083 mg/L at 519 South Lavaca Dr, Moulton (DBP2-01) and with a LRAA of 0.081 mg/L at 306 Longhorn Drive, Moulton (DBP2-02).

**F. Environmental audits:**

N/A

**G. Type of environmental management systems (EMSSs):**

N/A

**H. Voluntary on-site compliance assessment dates:**

N/A

**I. Participation in a voluntary pollution reduction program:**

N/A

**J. Early compliance:**

N/A

**Sites Outside of Texas:**

N/A

## **Component Appendices**

### **Appendix A**

#### **All NOVs Issued During Component Period 7/6/2013 and 7/6/2018**

1	Date: 09/30/2014 (1215445)	Self Report? NO	Classification: Moderate
		Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1) 5A THSC Chapter 341, SubChapter A 341.0315(c)	<b>For Informational Purposes Only</b>
		Description: TTHM LRAA MCL 3Q2014 - Failed to comply with the MCL of 0.080 milligrams per liter ("mg/L") for TTHM, based on the locational running annual average. Specifically, the locational running annual average concentrations for TTHM at Stage 2 Disinfection Byproducts site 1 were 0.089 milligrams per liter ("mg/L") for the third quarter of 2014 and 0.084 mg/L for the fourth quarter of 2014.	
2	Date: 11/10/2014 (1215445)	Self Report? NO	Classification: Moderate
		Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(2)(A) 30 TAC Chapter 290, SubChapter F 290.122(f)	<b>For Informational Purposes Only</b>
		Description: TTHM DBP2 MCL PN 3Q2014 Posting and Reporting Violation - Failed to timely provide public notification and submit a copy of the public notification to the Executive Director regarding the failure to comply with the MCL for TTHM for the third quarter of 2014.	
3	Date: 12/16/2014 (1215713)	Self Report? NO	Classification: Moderate
		Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1) 5A THSC Chapter 341, SubChapter A 341.0315(c)	<b>For Informational Purposes Only</b>
		Description: TTHM LRAA MCL 4Q2014 - Failed to comply with the MCL of 0.080 milligrams per liter ("mg/L") for TTHM, based on the locational running annual average. Specifically, the locational running annual average concentrations for TTHM at Stage 2 Disinfection Byproducts site 1 were 0.089 milligrams per liter ("mg/L") for the third quarter of 2014 and 0.084 mg/L for the fourth quarter of 2014.	
4	Date: 01/30/2015 (1217738)	Self Report? NO	Classification: Minor
		Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(K)	<b>For Informational Purposes Only</b>
		Description: Failed to seal all wellheads with a proper gasket or sealing compound.	
		Self Report? NO	Classification: Minor
		Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(I)	<b>For Informational Purposes Only</b>
		Description: Failed to maintain well sites fine graded so that the site is free from depressions, reverse grades, or areas too rough for proper ground maintenance so as to ensure that surface water will drain away from the well.	
		Self Report? NO	Classification: Moderate
		Citation: 30 TAC Chapter 290, SubChapter D 290.42(I)	<b>For Informational Purposes Only</b>
		Description: Failed to maintain a thorough plant operations manual kept up to date for operator review and reference.	
		Self Report? NO	Classification: Moderate
		Citation: 30 TAC Chapter 290, SubChapter D 290.44(h)(4)	<b>For Informational Purposes Only</b>
		Description: Failed to test all backflow prevention assemblies which are installed to provide protection against health hazards at least annually by a licensed backflow prevention assembly tester.	
		Self Report? NO	Classification: Moderate
		Citation: 30 TAC Chapter 290, SubChapter D 290.46(d)(2)(A)	<b>For Informational Purposes Only</b>
		Description: Failed to maintain a chlorine residual of 0.2 mg/L (measured as free) in the water within the distribution system.	
		Self Report? NO	Classification: Moderate
		Citation: 30 TAC Chapter 290, SubChapter D 290.46(s)(2)(C)(I)	<b>For Informational Purposes Only</b>
		Description: Failed to verify the accuracy of manual disinfectant residual analyzers at least once every 90 days using chlorine solutions of known concentrations.	
		Self Report? NO	Classification: Minor
		Citation: 30 TAC Chapter 290, SubChapter F 290.110(c)(4)(B)	<b>For Informational Purposes Only</b>
		Description: Failed to monitor the disinfectant residual at representative locations in the distribution system at least once per day by public water systems that serves at least 250 connections or at least 750 people daily, and uses only groundwater or purchased water sources.	
		Self Report? NO	Classification: Minor
		Citation: 30 TAC Chapter 290, SubChapter F 290.110(f)(1)(B)	<b>For Informational Purposes Only</b>
		Description: Failed to obtain all samples used for compliance at sampling sites designated in	

		the monitoring plan.
Self Report?	NO	Classification: Minor
Citation:	30 TAC Chapter 290, SubChapter F 290.121(a)	
Description:	Failed to maintain an up-to-date chemical and microbiological monitoring plan.	
5	Date: 10/06/2015 (1335747)	
Self Report?	NO	Classification: Moderate
Citation:	30 TAC Chapter 290, SubChapter H 290.272	
	30 TAC Chapter 290, SubChapter H 290.273	
	30 TAC Chapter 290, SubChapter H 290.274(a)	
	30 TAC Chapter 290, SubChapter H 290.274(c)	
Description:	CCR 2014- Failed to meet the adequacy requirements of the CCR distributed to the customers of the Facility for 2014; in the Consumer Confidence Report ("CCR") distributed to the customers of the Facility for 2014, the source water assessment language was incorrect, the name of the source of water was missing, the disinfectant residual information was missing, delivery to customers was incorrect, and certification of delivery was missing or incomplete.	
6	Date: 11/05/2015 (1335747)	
Self Report?	NO	Classification: Moderate
Citation:	30 TAC Chapter 290, SubChapter F 290.117(c)(2)(C)	
	30 TAC Chapter 290, SubChapter F 290.117(h)	
	30 TAC Chapter 290, SubChapter F 290.117(i)(1)	
Description:	LCR RD MR 3Y2015 - Respondent did not collect lead and copper tap samples at the required ten sample sites, have the samples analyzed, and report the results to the Executive Director for the January 1, 2013 through December 31, 2015 monitoring period.	
7	Date: 03/14/2016 (1335747)	
Self Report?	NO	Classification: Moderate
Citation:	30 TAC Chapter 290, SubChapter F 290.115(f)(1)	
	5A THSC Chapter 341, SubChapter A 341.0315(c)	
Description:	TTHM LRAA MCL 1Q2016 - Failed to comply with the MCL of 0.080 mg/L for TTHM, based on the locational running annual average; the locational running annual average concentrations of total trihalomethanes ("TTHM") for Stage 2 Disinfection Byproducts ("DBP2") at Site 1 were 0.083 milligrams per liter ("mg/L") for the second quarter of 2016, and at Site 2 were 0.082 mg/L for the first quarter of 2016 and 0.089 mg/L for the second quarter of 2016.	
8	Date: 03/24/2016 (1335747)	
Self Report?	NO	Classification: Moderate
Citation:	30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)	
	30 TAC Chapter 290, SubChapter F 290.122(f)	
Description:	LCR RD MR PN 3Y2015 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a distribution lead and copper reduced monitoring and reporting violation for the triennial reduced monitoring period from 01/01/2013 to 12/31/2015.	
9	Date: 05/17/2016 (1335747)	
Self Report?	NO	Classification: Moderate
Citation:	30 TAC Chapter 290, SubChapter F 290.115(f)(1)	
	5A THSC Chapter 341, SubChapter A 341.0315(c)	
Description:	TTHM LRAA MCL 2Q2016 - Respondent failed to comply with the MCL of 0.080 mg/L for TTHM, based on the locational running annual average; the locational running annual average concentrations of total trihalomethanes ("TTHM") for Stage 2 Disinfection Byproducts ("DBP2") at Site 1 were 0.083 milligrams per liter ("mg/L") for the second quarter of 2016, and at Site 2 were 0.082 mg/L for the first quarter of 2016 and 0.089 mg/L for the second quarter of 2016.	
	Self Report?	NO
	Citation:	Classification: Moderate
	30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)	
	30 TAC Chapter 290, SubChapter F 290.122(f)	
	Description:	DLQOR MR PN 3Q2015 Posting and Reporting Violation - Respondent did not timely provide public notification and submit a copy of each public notification to the Executive Director regarding the failure to submit a Disinfectant Level Quarterly Operating Report ("DLQOR") for the third quarter of 2015.
10	Date: 11/01/2017 (1450030)	
Self Report?	NO	Classification: Moderate
	For Informational Purposes Only	

Citation: 30 TAC Chapter 290, SubChapter D 290.46(d)(2)(A)  
30 TAC Chapter 290, SubChapter F 290.110(b)(4)  
Description: Failed to maintain a disinfectant residual concentration in the water within the distribution system of at least 0.2 mg/L free chlorine.

11 Date: 04/06/2018 (1498002)  
Self Report? NO **For Informational Purposes Only** Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(e)(2)  
30 TAC Chapter 290, SubChapter F 290.115(f)(5)  
Description: DBP2 TTHM OEL Reporting - This system failed to submit the Operational Evaluation Report (OEL) after exceeding the operational evaluation level for trihalomethanes at 519 South Lavaca Dr, Moulton (DBP2-01) and 306 Longhorn Drive, Moulton (DBP2-02) within the required timeline.

12 Date: 04/13/2018 (1498002)  
Self Report? NO **For Informational Purposes Only** Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: TTHM LRAA MCL 1Q2018 - During the first quarter of 2018 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.084 mg/L at 519 South Lavaca Dr, Moulton (DBP2-01) and with a LRAA of 0.081 mg/L at 306 Longhorn Drive, Moulton (DBP2-02).

13 Date: 05/29/2018 (1498002)  
Self Report? NO **For Informational Purposes Only** Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.122(b)(2)(A)  
30 TAC Chapter 290, SubChapter F 290.122(f)  
Description: TTHM DBP2 MCL PN 1Q2018 Posting and Reporting Violation - Failure to submit a signed certificate of delivery to the Executive Director certifying that public notice was issued pursuant to 30 Tex. Admin. Code §290.122 during the time period that public notice was required for a violation of the maximum contaminant level for trihalomethanes during the first quarter of 2018.

14 Date: 06/13/2018 (1498002)  
Self Report? NO **For Informational Purposes Only** Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: TTHM LRAA MCL 2Q2018 - During the second quarter of 2018 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.083 mg/L at 519 South Lavaca Dr, Moulton (DBP2-01) and with a LRAA of 0.081 mg/L at 306 Longhorn Drive, Moulton (DBP2-02).

\* NOVs applicable for the Compliance History rating period 9/1/2012 to 8/31/2017

## Appendix B

### All Investigations Conducted During Component Period July 06, 2013 and July 06, 2018

Item 1	December 16, 2014**	<sup>(1215445)</sup> <b>For Informational Purposes Only</b>
Item 2	December 19, 2014**	<sup>(1215791)</sup> <b>For Informational Purposes Only</b>
Item 3	January 30, 2015**	<sup>(1217738)</sup> <b>For Informational Purposes Only</b>
Item 4	May 29, 2015**	<sup>(1245400)</sup> <b>For Informational Purposes Only</b>
Item 5	June 29, 2016**	<sup>(1235747)</sup> <b>For Informational Purposes Only</b>
Item 6	July 08, 2016**	<sup>(1243890)</sup> <b>For Informational Purposes Only</b>
Item 7	June 26, 2018	<sup>(1498602)</sup> <b>For Informational Purposes Only</b>
Item 8	June 29, 2018	<sup>(1498682)</sup> <b>For Informational Purposes Only</b>

\* No violations documented during this investigation

\*\*Investigation applicable for the Compliance History Rating period between 09/01/2012 and 08/31/2017.

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
CITY OF MOULTON  
RN101391787**

§§§§§  
**BEFORE THE**  
**TEXAS COMMISSION ON**  
**ENVIRONMENTAL QUALITY**

**AGREED ORDER**  
**DOCKET NO. 2018-0921-PWS-E**

On \_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding the City of Moulton (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this Order to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

## I. FINDINGS OF FACT

1. The Respondent owns and operates a public water supply located at 104 South Hackberry Street in Moulton, Lavaca County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 559 service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a public water system as defined in 30 TEX. ADMIN. CODE § 290.38(71).
2. During a record review conducted on June 4, 2018 through June 29, 2018, an investigator documented that:
  - a. The locational running annual average concentrations for total trihalomethanes ("TTHM") for Stage 2 Disinfection Byproducts ("DBP2") at Site 1 for the first quarter of 2018 and the second quarter of 2018 were 0.084 milligrams per liter ("mg/L") and 0.083 mg/L, respectively, and at Site 2 for the first quarter of 2018 and the second quarter of 2018 were 0.081 mg/L and 0.081 mg/L, respectively. Additionally, public notification regarding the failure to comply with the

maximum contaminant level ("MCL") for TTHM during the first quarter of 2018 was required by May 13, 2018, but was not provided.

- b. The Respondent did not conduct an operation evaluation and submit a written operation evaluation report to the Executive Director within 90 days after being notified of analytical results that caused an exceedance of the operational evaluation level for TTHM for DBP2 at Sites 1 and 2 during the fourth quarter of 2017.
3. The Executive Director recognizes that the Respondent provided public notification regarding the failure to comply with the MCL for TTHM during the first quarter of 2018 by July 8, 2018.

## **II. CONCLUSIONS OF LAW**

1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 341 and the rules of the TCEQ.
2. As evidenced by Finding of Fact No. 2.a, the Respondent failed to comply with the MCL of 0.080 mg/L for TTHM based on the locational running annual average, and failed to provide public notification and submit a copy of the public notification, accompanied with a signed Certificate of Delivery, to the Executive Director regarding the failure to comply with the MCL for TTHM, in violation of 30 TEX. ADMIN. CODE §§ 290.115(f)(1) and 290.122(b)(2)(A) and (f) and TEX. HEALTH & SAFETY CODE § 341.0315(c).
3. As evidenced by Finding of Fact No. 2.b, the Respondent failed to conduct an operation evaluation and submit a written operation evaluation report to the Executive Director within 90 days after being notified of analytical results that caused an exceedance of the operational evaluation level for TTHM for DBP2, in violation of 30 TEX. ADMIN. CODE § 290.115(e)(2).
4. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049(a), the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
5. An administrative penalty in the amount of \$584 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. HEALTH & SAFETY CODE § 341.049(b). The Respondent paid the \$584 penalty.

## **III. ORDERING PROVISIONS**

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 5 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the

Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Moulton, Docket No. 2018-0921-PWS-E" to:

Financial Administration Division, Revenue Operations Section  
Attention: Cashier's Office, MC 214  
Texas Commission on Environmental Quality  
P.O. Box 13088  
Austin, Texas 78711-3088

2. The Respondent shall undertake the following technical requirements:

- a. Within 30 days after the effective date of this Order, conduct an operation evaluation and submit an operation evaluation report to the Executive Director, in accordance with 30 TEX. ADMIN. CODE § 290.115. The operation evaluation report shall be submitted to:

Drinking Water Standards Section  
Water Supply Division, MC 155 (Attn: DBP)  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

- b. Within 45 days after the effective date of this Order, submit written certification of compliance with Ordering Provision No. 2.a, in accordance with Ordering Provision No. 2.d. The written certification shall include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance.
- c. Within 365 days after the effective date of this Order, return to compliance with the locational running annual average MCL for TTHM, in accordance with 30 TEX. ADMIN. CODE § 290.115.
- d. Within 380 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.c. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false

information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team  
Enforcement Division, MC 149A  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

with a copy to:

Drinking Water Special Functions Section Manager  
Water Supply Division, MC 155  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.
6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
7. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
8. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

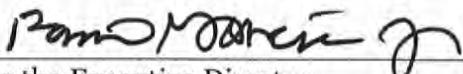
9. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

## SIGNATURE PAGE

### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



For the Executive Director

3/7/19

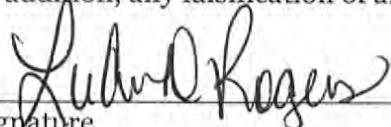
Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

  
Signature

Date

08/15/2018

LuAnn D. Rogers  
Name (Printed or typed)  
Authorized Representative of  
City of Moulton

City Administrator  
Title

If mailing address has changed, please check this box and provide the new address below: